

U.S. DISTRICT COURT
NORTHERN DIST. OF TX
F.T. WORTH DIVISION

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

2018 JUN 27 PM 1:57

CLERK OF COURT

WC

UNITED STATES OF AMERICA

v.

No. 4:11-CR-151-A-1

CRYSTAL LA VON MASON-HOBBS (01)

GOVERNMENT'S MOTION TO REVOKE
TERM OF SUPERVISED RELEASE

Pursuant to 18 U.S.C. § 3583(e)(3) and FED. R. CRIM. P. 32.1, the government files this motion to revoke the term of supervised release of defendant Crystal La Von Mason-Hobbs.

PROCEDURAL HISTORY OF THE CASE

On March 16, 2012, in the Fort Worth Division of the Northern District of Texas, defendant Crystal La Von Mason-Hobbs was convicted of conspiracy to defraud the United States, in violation of 18 U.S.C. § 371. She was sentenced to 60 months' custody followed by a three-year term of supervised release. Defendant's supervised release commenced on August 5, 2016.

CONDITIONS OF SUPERVISED RELEASE

1. The Court entered certain terms and conditions for the period of supervised release, including the following mandatory, standard and additional conditions the government alleges the defendant violated:

- a. Mandatory Condition No. 1: The defendant shall not commit another federal, state, or local crime.

- b. Mandatory Condition No. 8: If, upon commencement of supervised release, any part of the \$4,206,805.49 restitution ordered by this judgment remains unpaid, the defendant shall make payments on such unpaid amount at the rate of at least \$500 per month, the first such payment to be made no later than 60 days from the date the sentence is imposed and another payment to be made on the same day of each month thereafter until the restitution amount is paid in full. Any unpaid balance of the restitution ordered by this judgment shall be paid in full 60 days prior to the termination of the term of supervised release.

VIOLATIONS OF CONDITIONS

2. The government alleges that, while subject to the terms and conditions of supervised release, Aguilera violated each of the conditions outlined in paragraph one of this motion in the manner set forth below:


- a. Violation of Mandatory Condition No. 1: Mason-Hobbs violated this condition of supervised release on November 8, 2016, when she voted in the 2016 General Election, in violation of 64.012(B) of the Election Code. Mason-Hobbs was arrested on February 16, 2017 by the Tarrant County Sheriff's Office deputies and Tarrant County District Attorney Investigator Darla Dowell. On March 28, 2018, Mason-Hobbs was convicted in the 432nd District Court of Tarrant County, Texas in Case No. 1485710D of Illegal Voting, a Second degree felony.
- b. Violation of Mandatory Condition No. 8: Mason-Hobbs violated this condition of supervised release by failing to pay restitution as specified in her Judgment. A review of the Offender Payment Enhanced Report Access (OPERA) system revealed that from the date of her release until March 2017, no payments had been made toward restitution. Mason-Hobbs began making monthly payment of approximately \$50 per month in April 2017. To date Mason-Hobbs and others, who were jointly and severally liable for the loss, have made a total of \$4,965.80 in restitution payments.

CONCLUSION

The government requests that this Court set this motion for a hearing, and upon hearing, order that defendant Mason-Hobbs' term of supervised release be revoked and that she be required to serve her sentence according to law.

Respectfully submitted,


ERIN NEALY COX
UNITED STATES ATTORNEY


MEGAN J. FAHEY
Assistant United States Attorney
State Bar No. 24043655
801 Cherry Street, Suite 1700
Fort Worth, Texas 76102
Telephone: 817-252-5200
Facsimile: 817-252-5455

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above pleading was this day served upon Kim Cole, counsel of record for the defendant, and on U.S. Probation Officer, Fort Worth, Texas in accordance with the provisions of Rule 49 of the Federal Rules of Criminal Procedure.

DATED this 27th day of June, 2018.


MEGAN J. FAHEY
Assistant United States Attorney